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By ECF

October 17, 2019

Honorable Sarah Netburn  
Magistrate Judge, United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Expert Discovery Schedule in *In re Terrorist Attacks of Sept. 11, 2001*,  
03-MDL-1570 (S.D.N.Y.) (GBD) (SN)**

Dear Judge Netburn:

Pursuant to the Court's June 10, 2019 Order (ECF No. 4582), the Jurisdictional and Merits Defendants, (hereinafter "Defendants"<sup>1</sup>) in consultation with the Plaintiffs' Executive Committees ("PECs"), respectfully submit this joint status letter regarding a proposed schedule for expert discovery.

The Parties respectfully recommend that the Court adopt the following schedule for the exchange of expert reports and taking of expert depositions:

1. March 12, 2020: Plaintiffs' affirmative expert reports due.
2. July 10, 2020: Defendants' affirmative and rebuttal expert reports due.
3. September 8, 2020: Plaintiffs' rebuttal expert reports (if any) due.
4. December 7, 2020: Deadline for completion of expert depositions following expert report exchanges.

The PECs have suggested that they may seek additional discovery as a result of the United States government's denial of their *Touhy* requests. The Parties have agreed that in the event that new relevant information is disclosed as a result of additional discovery (if any) resulting from those challenges, a Party may timely supplement a previously issued expert report prior to the deposition of that expert witness.

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<sup>1</sup> Defendants include all defendants except the Kingdom of Saudi Arabia and Dallah Avco, which are not subject to expert discovery at this stage.

Hon. Sarah Netburn  
October 17, 2019  
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Respectfully submitted,

*/s/ Alan R. Kabat*

Alan R. Kabat  
Defendants' Executive Committee

cc: MDL-1570 counsel (by ECF)